

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA

v.

LOI VAN NGUYEN,

Defendant.

) Criminal Number:

04CR10086RCL

) Violations:

) 31 U.S.C. §§ 5313, 5322 and

) 18 U.S.C. § 2

INFORMATION

The United States Attorney charges that:

COUNTS ONE Through THREE: (Title 31 United States Code, Sections 5313 and 5322 -- Failure to File A Currency Transaction Report By A Financial Institution)

From on or about March 6, 2000, through on or about December 14, 2000, in the District of Massachusetts and elsewhere,

LOI VAN NGUYEN,

being a domestic financial institution as defined in 31 Code of Federal Regulations, Section 103.11(i), did willfully fail to file reports, as required by Title 31, United States Code, Section 5313(a) and regulations prescribed under that section, including Title 31, Code of Federal Regulations, Section 103.22, in connection with the following transactions, each of which involved the receipt by defendant LOI VAN NGUYEN of United States coins and currency in amounts exceeding \$10,000 from an undercover agent in exchange for, and in the approximate dollar amounts of, the checks set forth below for each count:

Count	Check #	Check Date	Payee	Amount
1	47315	03/24/00	Interstate Employment Agency, Inc.	\$49,752.00 in exchange for cash.
2	11101	04/14/00	Interstate Employment Agency, Inc.	\$11,586.79 in exchange for cash.
3	4998	04/20/00	Interstate Employment Agency, Inc.	\$69,420.96 in exchange for cash.

All in violation of Title 31, United States Code, Sections 5313(a) and 5322(a); 31 Code of Federal Regulations, Sections 103.11 and 103.22; and Title 18, United States Code, Section 2.

CRIMINAL FORFEITURE ALLEGATION
(31 U.S.C. § 5317)

1. As a result of the offenses alleged in Counts One through Three,

LOI VAN NGUYEN

defendant herein, shall forfeit to the United States for its use and benefit all property, real or personal, involved in the offense and any property traceable thereto.

2. If any of the forfeitable property described in paragraph 1 above, as a result of any act or omission of any defendant -

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third party;
- (c) has been placed beyond the jurisdiction of the Court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be subdivided without difficulty;

it is the intention of the United States, pursuant to Title 31, United States Code, Section 5317, to seek forfeiture of any other property of the defendants up to the value of the property described in paragraph 1 of this paragraph.

All in violation of Title 31, United States Code, Section